

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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:  
In re: :  
:  
THE FINANCIAL OVERSIGHT AND : PROMESA  
MANAGEMENT BOARD FOR PUERTO RICO, : Title III  
:  
as representative of : Case No. 17-BK-3283 (LTS)  
:  
THE COMMONWEALTH OF PUERTO RICO *et al.*, : (Jointly Administered)  
:  
Debtors.<sup>1</sup> :  
----- X

----- X  
:  
In re: :  
:  
THE FINANCIAL OVERSIGHT AND : PROMESA  
MANAGEMENT BOARD FOR PUERTO RICO, : Title III  
:  
as representative of : Case No. 17-BK-4780 (LTS)  
:  
PUERTO RICO ELECTRIC POWER AUTHORITY : **This filing relates only to**  
: **Case No. 17-BK-4780 (LTS)**  
:  
Debtor. :  
----- X

**ORDER GRANTING URGENT MOTION OF OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS TO FILE UNDER SEAL UNREDACTED OMNIBUS  
MOTION TO COMPEL PRODUCTION OF DOCUMENTS IN CONNECTION WITH  
PREPA RSA RULE 9019 SETTLEMENT MOTION**

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Upon consideration of the *Urgent Motion Of Official Committee Of Unsecured Creditors To File Under Seal Unredacted Omnibus Motion To Compel Production Of Documents In Connection With PREPA RSA Rule 9019 Settlement Motion* (the “Motion to Seal”),<sup>1</sup> the Court hereby FINDS AND DETERMINES THAT (i) the Court has jurisdiction to consider the Motion to Seal and the relief requested therein pursuant to section 310 of PROMESA; (ii) venue is proper before this Court pursuant to section 307(a) of PROMESA; (iii) due and proper notice of the Motion to Seal has been provided under the particular circumstances and no other or further notice need be provided; (iv) based on the statements and arguments made in the Motion to Seal, the Court finds that it is appropriate for the Committee to file under seal an unredacted version of the *Official Committee Of Unsecured Creditors’ Omnibus Motion To Compel Production Of Documents In Connection With Rule 9019 PREPA RSA Settlement Motion* [Case No. 17-3283, Dkt. No. 7204; Case No. 17-4780, Dkt. No. 1269] (the “Motion”). Accordingly, it is hereby ORDERED THAT:

1. The Committee is entitled to file the full, unredacted version of the Motion under seal.
2. The Clerk of Court will provide the Committee and the Oversight Board access to the sealed materials through their counsel of record.

Dated: June \_\_\_\_, 2019

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HONORABLE JUDITH GAIL DEIN  
UNITED STATES DISTRICT JUDGE

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<sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion to Seal.